

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

HSBC BANK PLC, *et al.*,

Defendants.

Adv. Pro. No. 09-01364 (SMB)

**STIPULATION EXTENDING THE FACT DISCOVERY CUT-OFF DATE**

Plaintiff Irving H. Picard (the “Trustee”), as trustee of the substantively consolidated liquidation proceeding of Bernard L. Madoff Investment Securities LLC (“BLMIS”), under the Securities Investor Protection Act (“SIPA”), 15 U.S.C. §§ 78aaa *et seq.* and Alpha Prime Fund Ltd. (the “Parties”), by and through their respective undersigned counsel, state as follows:

**WHEREAS**, pursuant to the Discovery Arbitrator’s Amended Fifth Discovery Order [ECF No. 629], the Fact Discovery Cut-Off Date is December 7, 2020;

**WHEREAS**, after having met and conferred concerning the Trustee's request for an extension to the Fact Discovery Cut-Off Date, the Parties agree and stipulate and the Discovery Arbitrator hereby orders:

1. The Fact Discovery Cut-Off Date is extended to December 7, 2021.
2. The Discovery Arbitrator's Amended Fifth Discovery Order [ECF No. 629]

otherwise remains in full force and effect.

Dated: December \_\_, 2020  
New York, New York

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*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff  
Investment Securities LLC and the Estate  
of Bernard L. Madoff*

**SO ORDERED**

Dated: December 1, 2020  
New York, New York

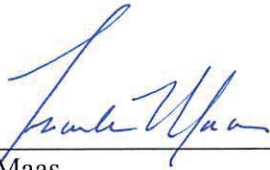
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*Attorneys for Alpha Prime Fund Ltd.*



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Frank Maas  
Discovery Arbitrator